

REMARKS

Favorable reconsideration and allowance of the present application are respectfully requested in view of the following remarks. Claims 1-28 were pending prior to the Office Action. Claims 29-48 are added in this Reply. Therefore, claims 1-48 are pending. Claims 1, 6, 11, 13, 15, 17, 19, 21, 23 and 26 are independent.

§ 103 REJECTION – MAYLE, MANOLIS

Claims 1-28 stand rejected under 35 USC 103(a) as allegedly being unpatentable over Mayle (USP 6,542,936) in view of Manolis et al. (USP 6,583,799) and in further view of “Ho-Ka-Go! English Homepage” (Nippon Telegraph and Telephone Corporation, pages 1-5, last updated 3/26/1998). Applicant respectfully traverses.

For a Section 103 rejection to be proper, a *prima facie* case of obviousness must be established. See *M.P.E.P. 2142*. One requirement to establish *prima facie case* of obviousness is that the prior art references, when combined, must teach or suggest all claim limitations. See *M.P.E.P. 2142; M.P.E.P. 706.02(j)*. Thus, if the cited references fail to teach or suggest one or more elements, then the rejection is improper and must be withdrawn.

Independent claim 1 recites, in part “concurrently displaying a plurality of the templates of the catalog and the user image.” For example, as illustrated

in Figure 2 of the present disclosure, the user image and the templates of the catalog are concurrently displayed. None of Mayle, Manolis and Ho-Ka-Go teach or suggest this feature. It logically follows that the combination of Mayle, Manolis and Ho-Ka-Go also fails to teach or suggest this feature. For at least this reason, independent claim 1 is distinguishable over the combination of Mayle, Manolis and Ho-Ka-Go.

Independent claims 6 recites, in part “concurrently displaying a plurality of the templates of the catalog and the plurality of user images.” For example, as illustrated in Figure 4 of the present disclosure, the user images and the templates of the catalog are concurrently displayed. None of Mayle, Manolis and Ho-Ka-Go teach or suggest this feature. It logically follows that the combination of Mayle, Manolis and Ho-Ka-Go also fails to teach or suggest this feature. For at least this reason, independent claim 6 is distinguishable over the combination of Mayle, Manolis and Ho-Ka-Go.

Independent claim 11 recites, in part “concurrently displaying a plurality of the templates of the catalog and the user image.” It is demonstrated above that the combination of Mayle, Manolis and Ho-Ka-Go fails to teach or suggest this feature. For at least this reason, independent claim 11 is distinguishable over the combination of Mayle, Manolis and Ho-Ka-Go.

Independent claims 13 recites, in part “concurrently displaying a plurality of the templates of the catalog and the plurality of user images.” It is

demonstrated above that the combination of Mayle, Manolis and Ho-Ka-Go fails to teach or suggest this feature. For at least this reason, independent claim 13 is distinguishable over the combination of Mayle, Manolis and Ho-Ka-Go.

Independent claim 15 recites, in part “concurrently displaying a plurality of the templates of the catalog and the user image.” As demonstrated above, the combination of Mayle, Manolis and Ho-Ka-Go fails to teach or suggest this feature. For at least this reason, independent claim 15 is distinguishable over the combination of Mayle, Manolis and Ho-Ka-Go.

Independent claims 17 recites, in part “concurrently displaying a plurality of the templates of the catalog and the plurality of user images.” As demonstrated above, the combination of Mayle, Manolis and Ho-Ka-Go fails to teach or suggest this feature. For at least this reason, independent claim 17 is distinguishable over the combination of Mayle, Manolis and Ho-Ka-Go.

Independent claims 19 recites, in part “concurrently displaying a plurality of the templates of single design of the catalog and the plurality of user images.” It is clear that the combination of Mayle, Manolis and Ho-Ka-Go fails to teach or suggest this feature. For at least this reason, independent claim 19 is distinguishable over the combination of Mayle, Manolis and Ho-Ka-Go.

Independent claim 21 recites, in part “concurrently displaying the plurality of the templates of the various designs of the catalog and the user

image.” It is clear that the combination of Mayle, Manolis and Ho-Ka-Go fails to teach or suggest this feature. For at least this reason, independent claim 21 is distinguishable over the combination of Mayle, Manolis and Ho-Ka-Go.

Independent claims 23 recites, in part “concurrently displaying the catalog of the plurality of image inserted templates and the image.” It is clear that the combination of Mayle, Manolis and Ho-Ka-Go fails to teach or suggest this feature. For at least this reason, independent claim 23 is distinguishable over the combination of Mayle, Manolis and Ho-Ka-Go.

Independent claim 26 recites, in part “concurrently displaying the catalog of the plurality of image inserted templates and the plurality of images.” It is clear that the combination of Mayle, Manolis and Ho-Ka-Go fails to teach or suggest this feature. For at least this reason, independent claim 26 is distinguishable over the combination of Mayle, Manolis and Ho-Ka-Go.

Claims 2-5, 7-10, 12, 14, 16, 18, 20, 22, 24-25 and 27-28 depend from independent claims 1, 6, 11, 13, 15, 17, 19, 21, 23 and 26 directly or indirectly. Therefore, for at least due to the dependency thereon from the independent claims, these dependent claims are also distinguishable over the combination of Mayle, Manolis and Ho-Ka-Go.

Applicant respectfully requests that the rejection of claims 1-28 based on Mayle, Manolis and Ho-Ka-Go be withdrawn.

NEW CLAIMS

Claims 29-48 are added through this Reply. All new claims are fully supported including Figures 2 and 4 of the present disclosure. All new claims are distinguishable over the cited references individually or in any combination for at least due to their dependency from the independent claims. Applicant respectfully requests that the new claims be allowed.

CONCLUSION

All objections and rejections raised in the Office Action having been addressed, it is respectfully submitted that the present application is in condition for allowance. Should there be any outstanding matters that need to be resolved, the Examiner is respectfully requested to contact Hyung Sohn (Reg. No. 44,346), to conduct an interview in an effort to expedite prosecution in connection with the present application.

Pursuant to 37 C.F.R. §§ 1.17 and 1.136(a), Applicant respectfully petitions for a three (3) months extension of time for filing a reply in connection with the present application, and the required fee is attached hereto.

If necessary, the Commissioner is hereby authorized in this, concurrent, and future replies, to charge payment or credit any overpayment to Deposit

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Account No. 02-2448 for any additional fees required under 37 C.F.R. §§ 1.16 or 1.17; particularly, extension of time fees.

Respectfully submitted,

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